

1 BOERSCH SHAPIRO LLP  
2 Lara Kollios (State Bar No. 235395)  
3 Lkollios@boerschshapiro.com  
4 1611 Telegraph Ave., Ste. 806  
5 Oakland, CA 94612  
6 Telephone: (415) 500-6640

5 Attorney for Defendant  
6 Jose Sotomayor

7  
8  
9  
10  
11  
12  
13  
14

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
JOSE SOTOMAYOR,  
Defendant.

Case No. 18-CR-00483-SI-2

**MOTION TO WITHDRAW AND FOR  
SUBSTITUTION OF COUNSEL**

Lara Kollios respectfully moves to withdraw as counsel of record for Jose Sotomayor and for substitution of Christopher J. Cannon, a fellow member of the Criminal Justice Act Panel. This motion is based on the fact that Ms. Kollios is leaving private practice.

Pursuant to 18 U.S.C. § 3006A(c), “[t]he United States Magistrate or the court may, in the interests of justice, substitute one appointed counsel for another at any stage of the proceedings.” Given Ms. Kollios’s departure from private practice and the constitutional importance of Mr. Sotomayor’s right to counsel, undersigned counsel respectfully moves to withdraw as counsel of record. Undersigned counsel understands that Mr. Cannon, a fellow member of the Criminal Justice Act Panel, has agreed to substitute in as counsel of record.

For the foregoing reasons, counsel respectfully requests that this Court grant Ms. Kollios’s motion to withdraw and appoint Mr. Cannon to represent Mr. Sotomayor in any and all further proceedings.

All pleadings, orders and notices should henceforth be served upon the following substituted counsel for Defendant Jose Sotomayor:

Christopher J. Cannon (State Bar No. 88034)  
[Chris@SugarmanandCannon.com](mailto:Chris@SugarmanandCannon.com)  
Sugarman & Cannon  
737 Tehama Street, #3  
San Francisco CA 94103  
Telephone: (415) 362-6252

Dated: March 21, 2019

## BOERSCH SHAPIRO LLP

/s/Lara Kollios  
Lara Kollios

Attorney for Jose Sotomayor

Dated: March 21, 2019

## SUGARMAN & CANNON

/s/Christopher J. Cannon  
Christopher J. Cannon

**[PROPOSED] ORDER**

Having reviewed the foregoing Motion to Withdraw and For Substitution of Counsel and good cause having been shown, IT IS HEREBY ORDERED that Lara Kollios is withdrawn as counsel of record.

IT IS FURTHER ORDERED that Christopher J. Cannon is appointed as new counsel of record under the Criminal Justice Act.

IT IS SO ORDERED.

Dated: March 21, 2019

Susan Illston  
HONORABLE SUSAN ILLSTON  
United States District Court Judge